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December 30, 2015

VIA ECF AND EMAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: *Irving H. Picard, Trustee v. Helen Saren-Lawrence* Adv. Pro. No. 10-04898 (SMB)

Dear Judge Bernstein:

I write to request a discovery conference to resolve an issue I have been unable to resolve with the Trustee. The Trustee intends to serve a subpoena on JPMorgan Chase for the purpose of establishing the transfers to and from the defendant's account. To that extent, we have no objection to the subpoena. However, since the Court has indicated that the Trustee is not entitled to bank records, other than for the purpose of establishing transfers to and from the Debtor, I have asked the Trustee's counsel to arrange for the bank records to be produced to me so that I can redact all personal and confidential information, leaving only the transfers to and from the Debtor.

The Trustee has refused to agree to this procedure and, instead, insists that he receive the unredacted bank records. We cannot agree to the wholesale disclosure of such confidential information.

I apologize that we could not resolve this issue without burdening the Court.

Yours respectfully,

/s/ Helen Davis Chaitman

Helen Davis Chaitman

HDC:leb

cc: *Via ECF and Email*
Casey E. Holder (cholder@bakerlaw.com)
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